



"Anderson, Alison"  
<Alison.Anderson@usdoj.gov>  
>

05/19/2017 10:34 AM

To "Jimmy\_O'Neill@nysd.uscourts.gov"  
<Jimmy\_O'Neill@nysd.uscourts.gov>  
"kennethbreen@paulhastings.com"  
cc <kennethbreen@paulhastings.com>,  
"johnnowak@paulhastings.com"

bcc

Subject RE: U.S. v Connolly & Black 16 CR 370 (CM) -- Query from Court

Jimmy,

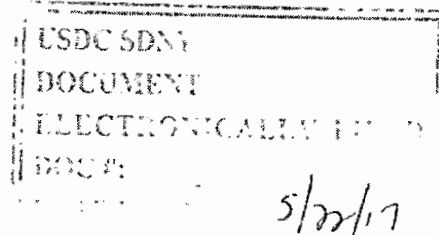
Thank you for your email. In order to respond quickly, we are providing the following to the Court's question about our Amalgamated Spreadsheets. It is our understanding from communications with the defense that they will have a separate response.

The Amalgamated Spreadsheets contain millions of lines of data including, but were not narrowed to, the trades upon which the Government currently intends to rely upon at trial. The Amalgamated Spreadsheets are tools created by DOJ that compiled information from many spreadsheets of Deutsche Bank trading data into one spreadsheet for each trading product (e.g., FRAs, swaps). The Amalgamated Spreadsheets also culled out columns that were not necessary for DOJ's investigative uses at the time they were created, allowing for a more efficient search process.

We are happy to answer any further questions.

Respectfully,  
Alison

Alison L. Anderson  
Trial Attorney  
Criminal Division, Fraud Section  
U.S. Department of Justice  
1400 New York Ave NW, 3rd Floor  
Washington, DC 20530



-----Original Message-----

From: Jimmy\_O'Neill@nysd.uscourts.gov [mailto:Jimmy\_O'Neill@nysd.uscourts.gov]  
Sent: Thursday, May 18, 2017 4:43 PM  
To: kennethbreen@paulhastings.com; johnnowak@paulhastings.com;  
pharaserle@paulhastings.com; jberman@levinelee.com; slevine@levinelee.com;  
akarp@levinelee.com; Anderson, Alison <Alison.Anderson@CRM.USDOJ.GOV>;  
Sipperly, Carol <Carol.Sipperly@CRM.USDOJ.GOV>; Koenig, Michael  
<Michael.Koenig@ATR.USDOJ.gov>  
Subject: U.S. v. Connolly & Black 16 CR 370 (CM) -- Query from Court

To the parties in U.S. v. Connolly & Black:

As you know, defendants' motions for a Bill of Particulars is currently under consideration by the Court. The Judge asked that I reach

out to the parties to get clarification of a statement made at page 2, first full paragraph, of the Joint Submission by Parties Regarding the Status of the Bill of Particulars Dispute, 5/14/17, ECF Document #86, that states: "On the day of the April 18, 2017 presentation to Defendants, the Government produced additional spreadsheets that it said were condensed versions of the underlying Trade Data ('the amalgamated Spreadsheets')." The Judge asks: DOES THAT MEAN THE UNDERLYING TRADE DATA FOR THE TRADES ON WHICH THE GOVERNMENT INTENDS TO RELY? OR SOMETHING MORE?

I await your response.

Jimmy